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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JERRY K. WONG, on behalf of himself and
all others similarly situated,

Plaintiff,

Case No. 2:14-cv-03252-ES-JAD

v.

PHELAN HALLINAN & DIAMOND, PC,
and GREEN TREE SERVING, LLC,

Defendants

**MOTION OF DEFENDANT PHELAN HALLINAN & DIAMOND, PC
TO DISMISS COMPLAINT WITH PREJUDICE**

Defendant Phelan Hallinan & Diamond, PC respectfully moves to dismiss the Complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for the reasons set forth in the accompanying Memorandum of Law. A proposed form of Order is attached.

Respectfully submitted,

By: /s/ Kenneth S. Goodkind
Kenneth Goodkind, Esq.
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1810 Chapel Avenue West
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Attorneys for Defendant Phelan Hallinan & Diamond, PC

Dated: September 30, 2014